

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Tony N. Taylor, on behalf of himself and all
others similarly situated,

Plaintiff,

No. 0:20-cv-02266-PAM-JFD

v.

STIPULATION FOR STAY

Inflection Risk Solutions, LLC,

Defendant.

NOW COME Plaintiff Tony N. Taylor and Defendant Inflection Risk Solutions, LLC, by their undersigned counsel, and respectfully state as follows:

WHEREAS, Plaintiff filed the operative Second Amended Complaint on October 20, 2021 (ECF No. 56), and Defendant answered on November 3, 2021 (ECF No. 57).

WHEREAS, the Court had entered a Scheduling Order in this matter on April 14, 2021 (ECF No. 34), outlining deadlines through trial ready date of August 1, 2022.

WHEREAS, the parties have commenced discovery, with each party having served and responded to a first set of written discovery and making document productions.

WHEREAS, the parties have been extensively meeting and conferring regarding the production of additional documents and data from Defendant including information necessary for meaningful settlement discussions;

WHEREAS, a mediation is scheduled for this matter, on December 7, 2021 with third party neutral Nicholas May, Esq.;

WHEREAS, to allow the parties to focus on settlement discussions, the parties agree that a stay of this matter would be appropriate, pending mediation.

WHEREFORE, subject to this Court's approval, the parties hereby STIPULATE AND AGREE and request that the Court order as follows:

1. The litigation of this matter is to be stayed until December 15, 2021 to allow the parties to attend mediation and conduct any subsequent discussions.
2. The pending scheduling deadlines are vacated.
3. By December 15, 2021, the parties shall inform the Court whether mediation was successful, and if unsuccessful, provide the Court a schedule for resuming litigation of this matter.

Respectfully submitted,

Dated: November 3, 2021

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